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DRYBAR HOLDINGS LLC, HUNTER JOHNSON, RENEE ATWOOD, PATRICE CAMPBELL, ZENA GARDNER, KATOYA SHAW, and RACHEL BERNARD

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHANE MICHAEL SANDOVAL, an individual,

Case No. 2:19-cv-00180-RFB-EJY

Plaintiff,

vs.

DRYBAR HOLDINGS LLC, a foreign limited liability company; HUNTER JOHNSON, in individual, RENEE ATWOOD, an individual, PATRICE CAMPBELL, an individual, ZENA LONG, an individual, KATOYA SHAW, AN INDIVIDUAL, RACHEL BERNARD, an individual; and DOES 1 through 100, inclusive.

Defendants.

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

[SECOND REQUEST]

Plaintiff, SHANE MICHAEL SANDOVAL and Defendants, DRYBAR HOLDINGS LLC, HUNTER JOHNSON, RENEE ATWOOD, PATRICE CAMPBELL, ZENA GARDNER, AND RACHEL BERNARD, by and through their respective counsel of record, do hereby stipulate and agree to amend the current scheduling order and discovery plan (ECF No. 67) by extending the current discovery cut-off date of January 6, 2020 for an additional 90 days until **April 6, 2020** (April 5, 2020 is a Sunday), with other discovery dates extended as set forth below.

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DISCOVERY COMPLETED TO DATE

To date, the parties have completed the following discovery:

Plaintiff:

Initial Disclosures	May 23, 2019
Responses to Defendant's Requests for Production	June 27, 2019
Responses to Defendant's Interrogatories	June 27, 2019
First Supplement to Initial Disclosures	June 27, 2019
Requests for Production to Drybar	July 26, 2019
Interrogatories to Drybar	July 26, 2019
Requests for Production to Johnson	July 26, 2019
Interrogatories to Johnson	July 26, 2019
Requests for Production to Atwood	July 26, 2019
Interrogatories to Atwood	July 26, 2019
Requests for Production to Campbell	July 26, 2019
Interrogatories to Campbell	July 26, 2019
Requests for Production to Gardner	July 26, 2019
Interrogatories to Gardner	July 26, 2019
Requests for Production to Bernard	July 26, 2019
Interrogatories to Bernard	July 26, 2019
Notice of Subpoena to Navex Global	August 20, 2019
Notice of Subpoena to Ogletree Deakins Nash & Smoak	August 20, 2019
Second Supplement to Initial Disclosures	October 23, 2019

Defendant:

Initial Disclosures	May 28, 2019
Requests for Production to Plaintiff	May 28, 2019
Interrogatories to Plaintiff	May 28, 2019
Responses to Requests for Production to Drybar	October 25, 2019
Responses to Interrogatories to Drybar	October 25, 2019

1 Responses to Requests for Production to Johnson October 25, 2019
2 Responses to Interrogatories to Johnson October 25, 2019
3 Responses to Requests for Production to Atwood October 25, 2019
4 Responses to Interrogatories to Atwood October 25, 2019
5 Responses to Requests for Production to Campbell October 25, 2019
6 Responses to Interrogatories to Campbell October 25, 2019
7 Responses to Requests for Production to Gardner October 25, 2019
8 Responses to Interrogatories to Gardner October 25, 2019
9 Responses to Requests for Production to Bernard October 25, 2019
10 Responses to Interrogatories to Bernard October 25, 2019

11 **DISCOVERY TO BE COMPLETED**

12 The parties anticipate the taking of several depositions, including Plaintiff's deposition,
13 Defendants' depositions, and witnesses identified by both parties. The parties also intend to serve
14 additional third party subpoenas. In addition, the parties are in the meet and confer process
15 regarding Plaintiff's responses to interrogatories and requests for production of documents and third
16 party subpoenas.

17 **REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

18 Good cause exists for the requested extension due to the number of parties in this action, and
19 the fact that the parties intend to depose all parties, additional time is needed to accommodate the
20 various depositions. Some of the anticipated deponents reside out of state. The parties also need
21 additional time to resolve discovery disputes. In addition, Defendant Shaw was recently served and
22 appeared in this matter on October 1, 2019, and may serve or need to respond to written discovery
23 prior to depositions. This is the second stipulation for extension of the discovery deadline and it is
24 sought in good faith and not for the purpose of delay.

25 **PROPOSED SCHEDULE**

26 **1. Discovery Cut-Off:**

27 The parties shall complete discovery not later than **April 6, 2020**.

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2. Dispositive Motions:

The parties shall file dispositive motions 30 days after the discovery cut-off date, and therefore not later than **May 6, 2020**.

3. Pretrial Order:

If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint Pretrial Order shall be filed 30 days after the date set for filing dispositive motions, and therefore not later than **June 5, 2020**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days after the Court enters a ruling on the dispositive motions, or otherwise by further order of the Court.

4. Extensions or Modifications of the Discovery Plan and Scheduling Order:

In accordance with Local Rule 26-4, any stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than 21 days prior to the expiration of the subject deadline.

Dated: November 15, 2019

Respectfully submitted,

Respectfully submitted,

/s/ Keen L. Ellsworth, Esq.
KEEN L. ELLSWORTH, ESQ.
ELLSWORTH & BENNION CHTD

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SHANE MICHAEL SANDOVAL

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CAMPBELL, ZENA LONG, KATOYA SHAW
and RACHEL BERNARD

IT IS SO ORDERED.

Dated this 18th day of November, 2019.

Mayra J. Zoucha
UNITED STATES MAGISTRATE JUDGE

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